

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

CHRISTOPHER C JOHNSON
Plaintiff,
v.
LEXISNEXIS RISK
SOLUTIONS
Defendants.

CASE NO. 23-cv-5615-RAJ

Complaint for a civil case

Jury Trial: Yes No

INTRODUCTION

1. This is a civil action for actual, statutory, and punitive damages and cost brought by Christopher C. Johnson, (“Plaintiff”) an individual consumer, against defendant, LexisNexis Risk Solutions for violations of the Fair Credit Reporting Act, 15 U.S.C § 1681 et seq. (hereinafter “FCRA”), The Washington Fair Credit Reporting Act Revised Code of Washington (RCW) 19.182.020, and The Washington Unfair Business Practices-Consumer Protection Act (RCW) 19.86.020.

BASIS OF JURISDICTION

1 2. Jurisdiction of this court arises under 15 U.S.C § 1681(p), and 28 U. S. C §
2 1331. Venue is proper in this judicial district pursuant to 28 U.S.C. 1391(b)(1) and 28 U.S.C. §
3 1391(b)(2) because a substantial part of the events, omissions, or conduct giving rise to Plaintiff
4 claim occurred in this judicial district. Defendant LexisNexis Risk Solutions transact business in
5 Puyallup, Pierce County, Washington.

6
7 3. The Court has supplemental jurisdiction of any state law claims pursuant to 28 U.S.C.
8 §1337.

9
10
11 PARTIES

12
13 4. Plaintiff, Christopher C. Johnson is a natural person and consumer as defined by 15
14 U.S.C. § 1681a(c), residing in Puyallup, Washington.

15
16 5. Upon information and belief, Defendant LexisNexis Risk Solutions is a Georgia
17 corporation.

18
19
20 6. Defendant LexisNexis Risk Solutions is a consumer reporting agency as defined by 15
21 U.S.C. § 1681a(f). LexisNexis is regularly engaged in the business of assembling, evaluating,
22 and disseminating information concerning consumers for the purpose of furnishing consumer
23 reports, as defined in 15 U.S.C. § 1681a(d) to third parties.

7. The acts of Defendants as described in this Complaint were performed by Defendants or on Defendant's behalf by its owners, officers, agents, and/or employees acting within the scope of their actual or apparent authority. As such, all references to "Defendant" in this complaint shall mean Defendants or their owners, officers, agents, and/or employees.

FACTUAL ALLEGATIONS

8. On or about January 10, 2023, Plaintiff reviewed his LexisNexis Consumer Report.

9. In the report the Plaintiff observed an unauthorized inquiry from Greenburg, Grant and Richards INC. Made on 3/15/2022 See Exhibit A.

10. On or about March 26, 2023, Plaintiff reviewed his LexisNexis Consumer Report.

11. In the report the Plaintiff observed an unauthorized inquiry from Harvest Strategy Group INC. Made on 1/30/2023 See Exhibit B.

12. On 3/26/2023 Plaintiff submitted a complaint to the Consumer Financial Protection Bureau to resolve the matter. See Exhibit C.

13. On 4/11/2023 LexisNexis responded to the CFPB complaint alleging that they have attempted to contact the Plaintiff and that the disputed unauthorized inquiries were identified, See Exhibit D.

1 14. Plaintiff has not received any correspondence from Defendant to resolve this matter
2 as of the date of this complaint.

3
4 15. Defendant LexisNexis Risk Solutions did not use reasonable procedures to certify
5 that the users, Greenburg, Grant and Richards INC and Harvest Strategy Group INC had
6 permissible purpose pursuant to the Fair Credit Reporting Act 15 U.S.C. 1681b.

7
8 16. Plaintiff never initiated a consumer credit transaction with Greenburg, Grant and
9 Richards INC or Harvest Strategy Group INC nor had an account with either entity.

10
11 17. Greenburg, Grant and Richards INC or Harvest Strategy Group INC did not own an
12 alleged account with Plaintiff.

13
14 18. Plaintiff never entered into a contract with Greenburg, Grant and Richards INC and
15 Harvest Strategy Group INC.

16
17 19. Plaintiff has the interest and right to be free from deceptive, misleading collection
18 efforts.

19
20 20. Plaintiff has the interest and right to privacy from the unauthorized furnishing of
21 personal identifiable information in his consumer reports.

22
23
24 21. Plaintiff's injury is "particularized" and "actual" in that the conduct that deprived

1 Plaintiff of his rights was directed by Defendants to Plaintiff specifically.

2

3 22. Plaintiff's injury is directly traceable to Defendant's conduct because if it were not
4 for the Defendant's conduct, Plaintiff would not have been deprived of his rights.

5

6 23. Defendant's conduct as described in this Complaint was willful, with the purpose
7 to either harm Plaintiff or with reckless disregard for the harm to Plaintiff that could
8 result from defendant conduct.

9

10 24. Plaintiff's injury is "particularized" and "actual" in that the Plaintiff has suffered
11 emotional distress from the Defendants unauthorized furnishing of his credit report.

12

13 25. Plaintiff's injury is "particularized" and "actual" in that the Plaintiff has suffered an
14 invasion of his privacy. This intrusion into the Plaintiffs personal information has caused a
15 feeling of vulnerability, worry and anxiety which lead to sleeplessness and headaches.

16

17 26. Plaintiff's injury is "particularized" and "actual" in that the Plaintiff has suffered fear
18 and anger over the invasion of his privacy.

19

20 27. Plaintiff's injury is "particularized" and "actual" in that the Plaintiff as suffered loss
21 of time into research and learning to defend against the defendant's violations of his rights.

22

23 28. Defendant's conduct as described in this complaint was willful, with the purpose

24

1 to either harm the Plaintiff or with reckless disregard for the harm to Plaintiff that could
2 result from defendant's conduct.

3
4 29. Plaintiff's injury is directly traceable to defendant's conduct because if it were not for
5 the defendant's conduct, Plaintiff would not have been deprived of his rights and would not have
6 been subject to the emotional distress, anxiety, worry and invasion of privacy caused by the
7 defendant actions.

8
9 30. Plaintiff justifiably fears that, absent this Court's intervention, defendant LexisNexis
10 Risk Solutions will continue to fail to certify users and ensure reports will be used for the
11 purposes listed in section 1681b of the Fair Credit Reporting Act.

12
13 31. Plaintiff justifiably fears that, absent this Court's intervention, Defendant LexisNexis
14 Risk Solutions will continue to allow any entity access consumer reports without permissible
15 purpose which is a violation of the Fair Credit Reporting act and an invasion of privacy.

16
17
18 32. The deprivation of Plaintiff's rights will be redressed by a favorable decision
19 herein.

20
21 33. A favorable decision herein would redress Plaintiff's injury with money damages.

22
23 34. A favorable decision herein would serve to deter Defendants from further similar
24 conduct.

1
2
3
COUNT I VIOLATION OF THE FAIR CREDIT REPORTING ACT

4
5 **15 U.S.C § 1681e(a) LEXISNEXIS RISK SOLUTIONS.**

6
7 35. All preceding paragraphs are realleged.

8
9 36. Defendant LexisNexis Risk Solutions actions violated 15 U.S.C § 1681e(a) which
10 required every consumer reporting agency to maintain reasonable procedures to limit the
11 furnishing of consumer reports to the purposes listed under section 1681b of this title. “These
12 procedures shall require that prospective users of the information identify themselves, certify the
13 purposes for which the information is sought, and certify that the information will be used for no
14 other purpose. Every consumer reporting agency shall make a reasonable effort to verify the
15 identity of a new prospective user and the uses certified by such prospective user prior to
16 furnishing such user a consumer report.”

17
18 37. Defendant LexisNexis Risk Solutions failed to properly certify that Harvest Strategy
19 Group INC and Greenberg, Grant and Richards Inc had permissible purpose.

20
21 38. Defendant LexisNexis Risk Solutions failed to require Harvest Strategy Group INC
22 and Greenberg, Grant, and Richards Inc to certify the purpose for which the Plaintiffs credit
23 information was sought and certify that it will not be used for no other purpose.

1 39. Defendant LexisNexis Risk Solutions failed to identify Harvest Strategy Group INC
2 and Greenberg, Grant and Richards Inc and certify the uses of Plaintiffs consumer report prior to
3 furnishing Plaintiffs consumer report.

4

5 40. As a result of the Defendant LexisNexis Risk Solutions violations of the Fair Credit
6 Reporting Act, 15 U.S.C § 1681e(a) the Defendant is liable for actual and statutory damages and
7 cost.

8

9 **COUNT II VIOLATION OF THE WASHINGTON FAIR CREDIT REPORTING**
10 **ACT REVISED CODE OF WASHINGTON (RCW) 19.182.020 LEXISNEXIS RISK**

11 **SOLUTIONS**

12 41. All preceding paragraphs are realleged.

13

14 42. Revised Code of Washington (RCW) 19.182.020 defines the permissible purposes for
15 which consumer reporting agencies may furnish a consumer report.

16

17 43. Such permissible purpose as defined by the Revised Code of Washington (RCW)
18 19.182.020 are generally in response to a court order having jurisdiction to issue the order, In
19 accordance with the consumer written instructions, to a person that the agency has a reason to
20 believe: that intends to use the information in connection with a credit transaction, intends to use
21 the information in connection with the under writing of insurance, otherwise has a legitimate
22 business need in connection with a business transaction with the consumer.

44. Plaintiff alleges that Harvest Strategy Group INC and Greenberg, Grant and Richards Inc did not meet any requirements for permissible purpose as stated above.

45. Lexis Nexis Risk Solutions furnished the Plaintiffs consumer report without certifying Harvest Strategy Group INC and Greenberg, Grant, and Richards Inc.

46. If LexisNexis would have had reasonable procedures to certify if Harvest Strategy Group INC and Greenberg, Grant and Richards Inc had permissible purposes they would have found out that they did not meet the requirements and Plaintiff would not have been harmed.

47. Defendant LexisNexis violated Revised Code of Washington (RCW) 19.182.020 by furnishing the Plaintiff consumer report to Harvest Strategy Group INC and Greenberg, Grant, and Richards Inc to whom of which did not meet the requirements to access Plaintiffs consumer reports under Washington State Law.

48. For Defendants violations of the Revised Code of Washington (RCW) 19.182.020 Plaintiff is entitled to a monetary penalty of \$1000 per violation a total of \$2000 in accordance to Revised Code of Washington (RCW) 19.182.150

**COUNT III VIOLATION OF THE WASHINGTON UNFAIR BUSINESS
PRACTICES CONSUMER PROTECTION ACT REVISED CODE OF WASHINGTON**
(RCW) 19.86.020 LEXISNEXIS RISK SOLUTIONS

49. All preceding paragraphs are realleged.

50. Defendant violated the Washington Fair Credit Reporting Act by furnishing the Plaintiff consumer report to Harvest Strategy Group INC and Greenberg, Grant, and Richards

1 Inc to whom did not have permissible purpose pursuant to Revised Code of Washington (RCW)
2 19.182.020.

3

4 51. Defendant violation of the Washington Fair Credit reporting act is an unfair or
5 deceptive act in trade or commerce and an unfair method of competition according to RCW
6 19.182.150.

7 52. Defendant LexisNexis violation of the Washington Unfair Business Practices-
8 Consumer Protection act entitles the Plaintiff to actual damages of emotional distress, anxiety,
9 loss of time for \$5000 pursuant to RCW 19.86.090.

10

11 **JURY DEMAND AND PRAYER FOR RELIEF**

12

13 Wherefore, Plaintiff Christopher C. Johnson, respectfully demands a jury trial and
14 request that judgment be entered in favor or the Plaintiff against the Defendants for:

15

16 1. Violating the Fair Credit Reporting act.
17 2. Actual, statutory, and punitive damages pursuant to 15 U.S.C. § 1681n and 1681o.
18 3. Statutory damages of \$1000 pursuant to Revised Code of Washington (RCW)
19 19.182.150;
20 4. Actual damages pursuant to Revised Code of Washington (RCW) 19.182.020.
21 5. For such other and further relief as the court may deem just and proper.

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23

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Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

9 I agree to provide the Clerk's Office with any changes to my address where case-related
10 papers may be served. I understand that my failure to keep a current address on file with the
11 Clerk's Office may result in the dismissal of my case.

12 Date: 7-7-2023

Signature: Christopher C. Johnson
Christopher C. Johnson
5613 121st Street Court E #1
Puyallup, WA 98373
206-331-2202
cejay80@gmail.com

20221113

Written Consent -

Credit Karma, LLC 1500 Broadway Suite 1800 Oakland CA 94612

Prequalification

510-5238

Total Pages 37 of 54

Page 35

RPT-LNCDR-10-19a

Exhibit A

1/1/2023

20221113	Written Consent - Prequalification	Credit Karma, LLC 1500 Broadway Suite 1800 Oakland CA 94612 510-5238
20221113	Written Consent - Prequalification	Credit Karma, LLC 1500 Broadway, Suite 1800 Oakland CA 94612 510-5238
20220711	Written Consent - Prequalification	Credit Karma, LLC 1500 Broadway, Suite 1800 Oakland CA 94612 510-5238
20220711	Written Consent - Prequalification	Credit Karma, LLC 1500 Broadway, Suite 1800 Oakland CA 94612 510-5238
20220710	Written Consent - Prequalification	Credit Karma, LLC 1500 Broadway, Suite 1800 Oakland CA 94612 510-5238
20220713	Written Consent - Prequalification	Credit Karma, LLC 1500 Broadway Suite 1800 Oakland CA 94612 510-5238
20220713	Written Consent - Prequalification	Credit Karma, LLC 1500 Broadway Suite 1800 Oakland CA 94612 510-5238
20220419	Insurance Underwriting	Liberty Mutual Co 1000 L ST NW SUITE 1100 WASHINGTON DC 20004
20220419	Insurance Underwriting	State Farm Mutual Auto Insurance Company 1 State Farm Plaza BLOOMINGTON IL 61701
20220419	Insurance Underwriting	Geico 4235 Georgia Blvd Macon GA 31201
20220419	Insurance Underwriting	State Farm Mutual Auto Insurance Company 1 State Farm Plaza BLOOMINGTON IL 61701
20220419	Insurance Underwriting	State Farm Mutual Auto Insurance Company 1 State Farm Plaza BLOOMINGTON IL 61701
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20220419	Insurance Underwriting	State Farm Mutual Auto Insurance Company 1 State Farm Plaza BLOOMINGTON IL 61701
20220419	Insurance Underwriting	Travelers Commercial Accounts 1 TOWER SQ HARTFORD CT 06183-0601

The following inquiries are shared with companies that view your Consumer file, may be used in credit scoring and may impact a credit rating. The purpose of each inquiry is noted below under Inquiry Permissible Purpose and may include applying for credit or financing, debt collection activities, or tenant screening.

Date of Inquiry (Year/Mo/Day)	Inquiry Permissible Purpose	Inquiring Company and Contact Details
20220415	Collections	NAVY FEDERAL CREDIT UNION 800 SOLLUS LN SE 2 LENNA VR 22386 4307 28051677
20220513	Credit Application	NetCredit/Republic Bank & Trust 1700 N MILROY RD, CHICAGO IL 60614
20220515	Collections	GREENBERG CHANT & RICHARDS PC 500 WESTheimer Rd Ste 1500 HTX TX 77057 832611100

Exhibit B

4/26/2023

20221118	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238
20221118	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238
20221113	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238
20220921	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238
20220921	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238
20220920	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238
20220719	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238
20220719	Written Consent - Prequalification	Credit Karma, LLC 1100 Broadway Suite 1800 Oakland CA 07946 415-510-5238

The following inquiries are shared with companies that view your Consumer file, may be used in credit scoring and may impact a credit rating. The purpose of each inquiry is noted below under Inquiry Permissible Purpose and may include applying for credit or financing, debt collection activities, or tenant screening.

Date of Inquiry (Year/Mo/Day)	Inquiry Permissible Purpose	Inquiring Company and Contact Details
20230130	Collections	Harvest Strategy Group Inc 1776 Lincoln Street Suite 900 Denver CO 80203 8666111121
<i>This record is currently under dispute. Date of dispute : 04/10/2023</i>		
20220815	Collections	NAVY FEDERAL CREDIT UNION 820 FOLLIN LN SE VIENNA VA 22180-4907 8003363767
20220812	Collections	NAVY FEDERAL CREDIT UNION 820 FOLLIN LN SE VIENNA VA 22180 8888426328

Military Lending Act Covered Borrower Status

This status indicates whether you are considered an active military service member, spouse of a service member, or a dependent of a service member as maintained by the Department of Defense. LexisNexis is an authorized reseller of this data provided by Equifax Information Services LLC and does not retain a copy of that information in your file. In order to see what information Equifax has on you, please contact them directly at 800-203-7843; PO Box 105873 Atlanta GA 30374; www.equifax.com.

Consumer Financial
Protection Bureau

Exhibit C

(https://www.consumerfinance.gov/)

Start a new complaint

[All complaints \(. \)](#)**230327-10698717****CLOSED** Submitted**STATUS**

Submitted to the CFPB on 3/26/2023

PRODUCT

Credit reporting, credit repair services, or other personal consumer reports

ISSUE

Improper use of your report

We received your complaint. Thank you.

We will review your complaint. Depending on what we find, we will typically:

- Send your complaint to the company for a response; or
- Send your complaint to another state or federal agency, or help you get in touch with your state or local consumer protection office; or
- Let you know if we need more information to continue our work.

YOUR COMPLAINT

Lexis Nexis has violated the Fair Credit Reporting Act by allowing several debt collectors to obtain my Lexis Nexis consumer file without proper permissible purposes allowed by law. I have no account, or business nor have I ever allowed these debt collectors to access my Lexis Nexis Consumer File. Greenburg Grant & Richards INC. and Harvest Strategy Group Inc are the two debt collectors who unlawfully accessed my report. I demand Lexis Nexis provide me with what information they provided in order for them to release my information with these debt collectors. My Lexis Nexis Consumer Number: 27294931 and Case Number: 61113981.

Hide full complaint 

Exhibit C

What product or service is your complaint about?

PRODUCT OR SERVICE

Credit reporting, credit repair services, or other personal consumer reports

TYPE

Other personal consumer report

What type of problem are you having?

ISSUE

Improper use of your report

HAVE YOU ALREADY TRIED TO FIX THIS PROBLEM WITH THE COMPANY?

Yes

What happened?

Lexis Nexis has violated the Fair Credit Reporting Act by allowing several debt collectors to obtain my Lexis Nexis consumer file without proper permissible purposes allowed by law. I have no account, or business nor have I ever allowed these debt collectors to access my Lexis Nexis Consumer File. Greenburg Grant & Richards INC. and Harvest Strategy Group Inc are the two debt collectors who unlawfully accessed my report. I demand Lexis Nexis provide me with what information they provided in order for them to release my information with these debt collectors. My Lexis Nexis Consumer Number: 27294931 and Case Number: 61113981.



I want the CFPB to publish this description on consumerfinance.gov so that others can learn from my experience.

The CFPB will take steps to remove my personal information from this description but someone may still be able to identify me. Learn how it works. I consent to publishing this description after the CFPB has taken these steps.

*Exhibit C***What would be a fair resolution to this issue?**

I am demanding Statutory relief under 15 USC 1681n(a). Lexis Nexis has violated this Federal Law 3 times so I'm Demanding a total amount of \$3000. If Lexis Nexis ignore or refuse to provide relief under Federal Law for these violations I will seek litigation in Federal Court.

What company is this complaint about?**COMPANY INFORMATION**

LexisNexis Risk Solutions

What people are involved?**YOUR CONTACT INFORMATION**

Christopher C Johnson

cejay80@gmail.com
2063312202

5613 121st Street Court E #1 Puyallup, Washington 98373 United States

YOUR DEMOGRAPHIC INFORMATION**Age**

42

Service details

Branch: United States Army
Status: Retired

Sent to company

68474 ✓

STATUS

Sent to company on 3/26/2023

We've sent your complaint to the company, and we will let you know when they respond.

Their response should include the steps they took, or will take, to address your complaint.

Companies generally respond in 15 days. In some cases, the company will let you know their response is in progress and provide a final response in 60 days.

Company responded

STATUS

Company responded on 4/11/2023

RESPONSE TYPE

Closed with explanation

Company's Response

Please see attached letter outlining LexisNexis Risk Solution Inc.'s response to the complaint received by your office.

ATTACHMENTS

[CFPB Response-Christopher Johnson .pdf \(125.6 KB\)](#)

Feedback requested

STATUS

Feedback requested on 4/11/2023

FEEDBACK DUE

6/10/2023

Exhibit J



LexisNexis® Consumer Center
Consumer Number: 27985341

April 11, 2023

CONSUMER FINANCIAL PROTECTION BUREAU
P.O. BOX 4503
IOWA CITY, IA 52244

Re: CFPB Case # 230327-10698717
CHRISTOPHER JOHNSON
5613 121ST ST CT E #1
PUYALLUP, WA 98373

To Whom It May Concern:

This correspondence is in response to the complaint LexisNexis Risk Solutions Inc. ("LexisNexis") received from your office on 3/26/2023 on behalf of Mr. Christopher Johnson, in which Mr. Johnson disputes the alleged inaccurate reporting of credit inquiries listed on his credit report. Thank you for your patience while we reviewed this matter and prepared the appropriate response.

In response to Mr. Johnson's complaint, LexisNexis located the credit inquiries we believe he is questioning and initiated a dispute of said records on his behalf. However, based on the information Mr. Johnson provided in his complaint, we are unable to fully authenticate his identity. LexisNexis attempted to contact Mr. Johnson on 4/6/2023 via email at cejay80@gmail.com and on 04/10/2023 via phone to obtain additional identifiers but as of today, we have not received a response.

If Mr. Johnson would like the results to this investigation, along with a copy of his Consumer Disclosure Report ("LNCDR") we encourage him to contact the LexisNexis Consumer Center so we may fully authenticate his identity. Even though Mr. Johnson has provided his name and address; LexisNexis still needs additional information. We ask that Mr. Johnson provide a clear copy of his government ID or social security number and a bill within the last 60 days with his current address. The additional documentation can be sent to the address below:

LexisNexis Consumer Center
Attn: Escalations
PO Box 105108
Atlanta, GA 30348-5108

Please be advised LexisNexis does not produce consumer reports that contain tradeline data. LexisNexis is a reseller of credit reports from the three nationwide consumer reporting agencies – Experian, Equifax, and Transunion – and follows the reinvestigation requirements outlined in the Fair Credit Reporting Act ("FCRA," 15 U.S.C. § 1681 et seq.) for disputes of the information therein. LexisNexis submits disputes to the originating consumer reporting agency and forwards the results received from the nationwide consumer reporting agencies to the consumer when the nationwide consumer reporting agencies complete their reinvestigation. LexisNexis also initiated a dispute of the

credit inquiry with the nationwide consumer reporting agencies on his behalf. LexisNexis will notify Mr. Johnson via mail once the credit bureau completes their investigation; however, please note, the bureau may contact Mr. Johnson directly with the results of the investigation.

If Mr. Johnson has any questions regarding how and what information is displayed on a credit bureau report, Mr. Johnson will need to contact the credit bureaus directly.

Equifax P.O. Box 740241 Atlanta, GA 30374 800-525-6285 www.equifax.com	Experian P.O. Box 9532 Allen, TX 75013 888-397-3742 www.experian.com	TransUnion Consumer Relation 2 Baldwin Place Chester, PA 19022-1000 Order Credit Report: 800-888-4213 Report Fraud: 800-680-7289 www.transunion.com
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Under the FCRA, Mr. Johnson has the right to:

- Request a description of the procedure used to determine the accuracy and completeness of disputed information, including the business name and address, and telephone number if reasonably available, of any furnisher of information contacted.
- Add a statement to his file disputing the accuracy or completeness of information. The statement will remain on file and will be furnished to recipients of the file as long as the disputed information is still used; and
- Request that LexisNexis furnish notification of the deletion of disputed information or a dispute statement to any person specifically designated by him who has received a LexisNexis consumer report for employment purposes within the past two years or received a LexisNexis consumer report for any other purpose in the past six months (twelve months for residents of Colorado, Maryland, and New York).

Mr. Johnson may contact the LexisNexis Consumer Center via email at consumer.documents@LexisNexis.com or by phone at 888-497-0011. The LexisNexis Consumer Center's hours of operation are Monday - Friday from 8:00 AM to 7:00 PM Eastern Time. If Mr. Johnson would like a copy of his LexisNexis Consumer Disclosure Report, he may either call the LexisNexis Consumer Center or go to our Consumer Portal at <https://consumer.risk.lexisnexis.com/>.

Thank you for allowing LexisNexis the opportunity to assist Mr. Johnson.